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The Honorable Thomas S. Zilly

**United States District Court
Western District of Washington At Seattle**

Peajai Ely,

Plaintiff,

v.

Holland America Line N.V., Hal Antillen
N.V., and Holland America Line, Inc.,

Defendants.

No. CV-18-1690-TSZ

**Stipulated Motion and Order To
Continue Disclosure of Expert Testimony
And Discovery Deadlines Limited to
Experts Participating In Vessel Inspection**

STIPULATION

The parties hereby stipulate to a limited extension of the deadlines to disclose expert testimony and for the completion of discovery to accommodate an inspection of the subject cruise ship by the parties experts on April 15, 2020. The parties request an extension of the deadline for disclosing testimony from experts participating in the vessel inspection to May 29, 2020, and the deadline for completing discovery with regard to said experts to June 25, 2020.

**Stipulated Motion and Order To Continue
Disclosure of Expert Testimony And Discovery Deadlines
Limited to Experts Participating In Vessel Inspection - 1
Case No 18 - 01690 - TSZ**

Seattle Maritime Attorneys
225 106th Avenue
Bellevue, WA 98004
425-454-3800

1 In support of this Stipulated Motion, the parties state as follows:

2
3 1. The transient nature of the subject cruise ship has made inspection difficult to
4 coordinate. The vessel returns to the Pacific Northwest in April 2020, and will be available
5 for inspection by the parties and their experts in Seattle on Saturday, April 15, 2020, and at
6 regular intervals thereafter.

7
8 2. The requested continuance does not result from any lack of diligence on the
9 parties or counsel. Counsel for the parties have fostered an amicable working relationship
10 that has served to facilitate cooperation and recent settlement discussions. The parties are
11 working towards efficient completion of discovery, including written discovery, depositions,
12 scheduling Plaintiff's IME, and the inspection of a busy traveling cruise ship.

13
14 3. The parties limit the extension of expert the disclosure and discovery
15 completion deadlines to only the testimony of those experts that participate in the vessel
16 inspection. All other expert disclosures will be completed by February 24, 2020. All other
17 discovery will be completed by May 25, 2020. None of the other deadlines set by the Court's
18 Minute Order will be affected by the extensions.

19
20 4. Good cause exists for the requested extensions because additional time is
21 needed for the disclosure and discovery of testimony from experts involved in the vessel
22 inspection.

23
24 5. For these reason, the parties respectfully request the Court continue the deadline
25 for disclosing testimony from experts participating in the vessel inspection to May 29, 2020,
26 and the deadline for completing discovery with regard to said experts to June 25, 2020.

1 **Dated this 26th day of September, 2019.**

2 **Dated this 26th day of September, 2019.**

3 Merriam Law Firm
4 DbA Seattle Maritime Attorneys

Maltzman & Partners, P.A.

5 *s/John Merriam*

s/ Edgar R. Nield, per authority

6 John W. Merriam, WSBA #12749
7 4005 20th Avenue West, Suite 110
8 Seattle, Washington 98199
9 Telephone 206.729.5252
10 Facsimile 206.729.1012
11 E-mail: john@merriam-maritimelaw.com
12 Attorney for Plaintiff

Edgar R. Nield, WSBA #53297 & CASB #135018
Physical Address: 506 2nd Avenue, Suite 1400
Seattle, WA 98104
Mailing Address: 679 Encinitas Blvd #201
Encinitas, CA 92024
Telephone: 760.942.9880
Facsimile: 760.942.9882
E-mail: jeffrey@maltzmanpartners.com
E-mail: edn@maltzmanpartners.com
Attorneys for Defendants

11 Webb Law Firm
12 DbA Seattle Maritime Attorneys

13 *s/GORDON WEBB*

14 Gordon C. Webb, WSBA # 22777
15 225 106th Avenue NE
16 Bellevue, Washington 98004
17 Telephone 425.454.3800
18 Facsimile 425.307.6446
19 E-mail Gordon@webblawfirm.net
20 Attorney for Plaintiff

21 **ORDER**

22 THIS MATTER having come before the Court upon the stipulation of the parties,

23 **IT IS HEREBY ORDERED** that:

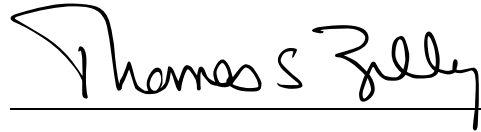
24 1. The deadline for disclosing testimony from experts participating in the vessel
25 inspection is continued to May 29, 2020, and the deadline for completing discovery with regard
26 to experts participating in the vessel inspection is continued to June 25, 2020.

27 **Stipulated Motion and Order To Continue**
28 **Disclosure of Expert Testimony And Discovery Deadlines**
29 **Limited to Experts Participating In Vessel Inspection - 3**
Case No 18 - 01690 - TSZ

SEATTLE MARITIME ATTORNEYS
225 106th Avenue
Bellevue, WA 98004
425-454-3800

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DATED this 1st day of October, 2019.



Thomas S. Zilly
United States District Judge

Presented By:

s/Gordon Webb

GORDON C. WEBB, WSBA # 22777
225 106th Avenue NE
Bellevue, WA 98004
Telephone: 425.454.3800
Fax: 425.307.6446
E-mail: gordon@webblawfirm.net
Attorneys for Plaintiff

Approved by, Copy Received:

s/ Edgar R. Nield, PER AUTHORITY

Edgar R. Nield, WSBA #53297 & CASB #135018
Jeffrey B. Maltzman, WSBA #52051 & CASB #131758
Physical Address: 506 2nd Avenue, Suite 1400
Seattle, WA 98104
Mailing Address: 679 Encinitas Blvd #201
Encinitas, CA 92024
Telephone: 760.942.9880
Facsimile: 760.942.9882
E-mail: jeffrey@maltzmanpartners.com
E-mail: edn@maltzmanpartners.com
Attorneys for Defendants